

## REMARKS/ARGUMENTS

Claims 1-2 are pending in the application; reexamination and reconsideration are hereby requested.

1. Claim 1 was objected to as informal; namely, the steps were mislabelled.

Claim 1 has been amended to relabel step (f) as step (e) and the reference to step (e) changed to step (d).

2. Claims 1-2 were rejected as unpatentable over Fimoff in view of Eifrig. The Examiner cited Fimoff column 17, lines 40-50 and added Eifrig for averaging top and bottom fields

Claims 1-2: Fimoff first converts frame DCT blocks to field DCT blocks, and then downsamples the field DCT blocks in the frequency domain; see column 8, lines 59-64, column 9, lines 10-15, and cited column 17, lines 46-51. Thus Fimoff does not suggest the claim 1, step (b) differing downsampling of frame and field blocks. Further, Fimoff maintains the downsampled field blocks for prediction, so there is no suggestion to apply the field averaging of either Eifrig or claim 1, substep (b)(ii).

Consequently, the claims are patentable over the references.

Respectfully submitted,

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